

Certificate of Notice Page 1 of 4
 United States Bankruptcy Court
 Eastern District of Pennsylvania

In re:
 Tommy Tam
 Debtor

Case No. 17-17147-ref
 Chapter 13

CERTIFICATE OF NOTICE

District/off: 0313-4

User: Keith
 Form ID: pdf900

Page 1 of 1
 Total Noticed: 2

Date Rcvd: Dec 18, 2018

Notice by first class mail was sent to the following persons/entities by the Bankruptcy Noticing Center on Dec 20, 2018.

db +Tommy Tam, 1608 W. Leesport Road, Leesport, PA 19533-8839

Notice by electronic transmission was sent to the following persons/entities by the Bankruptcy Noticing Center.
 cr +E-mail/PDF: gecsed@recoverycorp.com Dec 19 2018 02:38:11 Synchrony Bank,
 c/o PRA Receivables Management, LLC, PO Box 41021, Norfolk, VA 23541-1021

TOTAL: 1

***** BYPASSED RECIPIENTS *****

NONE.

TOTAL: 0

Addresses marked '+' were corrected by inserting the ZIP or replacing an incorrect ZIP. USPS regulations require that automation-compatible mail display the correct ZIP.

Transmission times for electronic delivery are Eastern Time zone.

I, Joseph Speetjens, declare under the penalty of perjury that I have sent the attached document to the above listed entities in the manner shown, and prepared the Certificate of Notice and that it is true and correct to the best of my information and belief.

Meeting of Creditor Notices only (Official Form 309): Pursuant to Fed. R. Bank. P. 2002(a)(1), a notice containing the complete Social Security Number (SSN) of the debtor(s) was furnished to all parties listed. This official court copy contains the redacted SSN as required by the bankruptcy rules and the Judiciary's privacy policies.

Date: Dec 20, 2018

Signature: /s/Joseph Speetjens

CM/ECF NOTICE OF ELECTRONIC FILING

The following persons/entities were sent notice through the court's CM/ECF electronic mail (Email) system on December 18, 2018 at the address(es) listed below:

DANIEL S. SIEDMAN on behalf of Creditor BM Manager, Inc. dsiedman@ciardilaw.com,
 dtorres@ciardilaw.com; sfrizlen@ciardilaw.com
 GEORGE M. LUTZ on behalf of Debtor Tommy Tam glutz@hvmllaw.com,
 amerkey@hvmllaw.com; r49419@notify.bestcase.com
 JEROME B. BLANK on behalf of Creditor HSBC Bank USA, National Association As Trustee For, et.
 al. paeb@fedphe.com
 K. KIRK KARAGELIAN on behalf of Creditor BM Manager, Inc. karagelian@csklaw.com,
 devine@csklaw.com
 KEVIN G. MCDONALD on behalf of Creditor VW Credit Leasing, Ltd bkgroup@kmlawgroup.com
 MATTEO SAMUEL WEINER on behalf of Creditor VW Credit Leasing, Ltd bkgroup@kmlawgroup.com
 REBECCA ANN SOLARZ on behalf of Creditor VW Credit Leasing, Ltd bkgroup@kmlawgroup.com
 ROLANDO RAMOS-CARDONA on behalf of Trustee FREDERICK L. REIGLE
 RRamos-Cardona@fredreiglechl3.com
 THOMAS YOUNG.HAE SONG on behalf of Creditor HSBC Bank USA, National Association As Trustee
 For, et. al. paeb@fedphe.com
 THOMAS YOUNG.HAE SONG on behalf of Creditor HSBC Bank USA, National Association As Trustee et
 al paeb@fedphe.com
 United States Trustee USTPRegion03.PH.ECF@usdoj.gov
 WILLIAM MILLER*R ecfmail@FredReigleChl3.com, ECF_FRPA@Trustee13.com

TOTAL: 12

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF PENNSYLVANIA
READING DIVISION**

In Re:

TOMMY TAM,

Debtor

Chapter 13 Bankruptcy

Bankruptcy No. 17-17147 REF

**Hearing scheduled for August 9, 2018, at 9:30
am, in Courtroom No. 1, The Madison Building,
400 Washington Street, Reading, Pennsylvania.**

**STIPULATION TO RESOLVE DEBTOR'S MOTION TO AVOID JUDGMENT LIEN
OF BM MANAGER, INC.**

Debtor, by and through his counsel, George M. Lutz, Esquire and Hartman, Valeriano, Magovern & Lutz, P.C., and BM Manager, Inc., by and through its attorney, Daniel S. Siedman, Esquire and Ciardi Ciardi & Astin hereby files this Stipulation to Resolve Motion to Avoid Judgment Lien of BM Manager, Inc., and in support thereof set forth as follows:

BACKGROUND

Tommy Tam is the Debtor in the above-captioned bankruptcy proceeding. BM Manager, Inc. trading as Berkshire Mall LP successor by conversion to Berkshire Mall, LLC ("Lienor"), is a creditor of the Debtor.

On October 21, 2017, the Debtor filed a Voluntary Petition under Chapter 13 of the United States Bankruptcy Code, said Petition being docketed as captioned above.

Prior to the date of filing of the bankruptcy proceeding, the Lienor obtained a judgment ("Judgment") against the Debtor in the Court of Common Pleas of Berks County, Pennsylvania. The judgment was obtained by the filing of a Confession of Judgment on June 21, 2017 with the Prothonotary of Berks County. The judgment is docketed to No. 2017-13927, and constitutes, may constitute, or may be considered to constitute a lien or an inchoate lien on the residential real estate owned by the Debtor in said county ("Judgment Lien"), located at 1608 West Leesport Road, Leesport, PA 19533 ("Residence").

On July 9, 2018, the Debtor filed a Motion to Avoid Lien, seeking to avoid the Judgment Lien as impairing the Debtor's exemptions under 11 U.S.C. 522. The Lienor has not filed a response to the Motion to Avoid Lien, but Debtor's counsel and Lienor's counsel have agreed that pending the resolution of the Motion to Avoid Lien, no response is necessary.

The Lienor and the Debtor have obtained appraisals of the Residence, and said appraisals indicate differing valuations of the Residence.

In order to avoid the costs and uncertainty of litigation, the Debtor and the Lienor hereby stipulate as follows:

STIPULATION

1. Within ten days of the date of the approval of this Stipulation by the Court, the Debtor will file an amended Chapter 13 Plan that provides for the payment of \$10,000.00 to the Lienor through the Plan.
2. Upon the issuance of the discharge by the Court in the instant bankruptcy proceeding and any and all payments are made to the Lienor, the Lienor will mark the Judgment "Satisfied" by filing the appropriate documentation with the Prothonotary of Berks County.
3. If the instant bankruptcy proceeding is dismissed and/or converted, this Stipulation will be null and void.
4. The Lienor has filed Proof of Claim No. 8, a secured claim. The Lienor hereby consents to payment of Proof of Claim No. 8 in the amount of \$10,000.00 as adequate treatment of said Proof of Claim in the Chapter 13 Plan.
5. The Lienor has also filed Proof of Claim No. 7, an unsecured claim. This claim shall remain in effect to the extent that there is any distribution as to general unsecured claims.

Dated: December 6, 2018

Respectfully submitted,

Hartman, Valeriano, Magovern & Lutz, PC

by: /s/ George M. Lutz

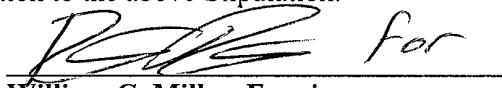
**George M. Lutz, Esquire
1100 Berkshire Boulevard, Suite 301
Wyomissing, PA 19610
Pa. Attorney ID No.: 46437
Attorneys for Debtor**

Ciardi Ciardi & Astin

by: /s/ Daniel S. Siedman

**Daniel S. Siedman, Esquire
One Commerce Square
2005 Market Street, Suite 3500
Philadelphia, PA 19103
Attorneys for BM Manager, Inc.**

The Chapter 13 Trustee has no objection to the above Stipulation.

 for

William C. Miller, Esquire
2901 St. Lawrence Avenue
P.O. Box 4010
Reading, PA 19606

AND NOW, THIS day of , 2018, the above Stipulation between the Debtor and
BM Manager, Inc. is APPROVED.

BY THE COURT



Date: December 18, 2018

Richard E. Fehling
Chief United States Bankruptcy Judge